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July 26, 2017

**BY EMAIL**

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: *Spencer Savings Bank, S.L.A. v. Bank of America Corp., et al.*,  
Civil Action No.: 2:14-cv-04633-KSH-CLW**

Dear Judge Waldor:

This firm represents Defendants Countrywide Financial Corporation, Countrywide Home Loans, Inc., and Bank of America, N.A., in its own capacity and as successor by July 1, 2011 *de jure* merger to BAC Home Loans Servicing, LP (f/k/a Countrywide Home Loans Servicing, LP) (collectively, "Defendants") in the above-referenced matter.

We write jointly with Plaintiff to request a status conference with Your Honor to discuss scheduling issues that have arisen. As discussed with Your Honor at the last in-court meeting on June 12, 2017, the parties are currently in the midst of expert discovery and preparing the joint pre-trial order. The parties have met in person to discuss the joint pre-trial submission and have plans for at least two more in-person meetings before the pre-trial conference set for September 6, 2017. The parties are making their best efforts to work together to put forth a substantial first draft of the joint proposed pre-trial order and do not, at this time, plan to request an adjournment of the pre-trial conference.

Defendants have requested additional time until August 25, 2017, to serve their expert reports. Plaintiff does not object to this provided that the end date for expert discovery be moved by the same amount of time from its presently agreed-upon date of September 1, 2017 to October 6, 2017 to allow Plaintiff to reserve the right to serve rebuttal reports and for expert depositions. Since the expert reports may also affect the summary judgment motions (currently due October 27), Plaintiff would propose adjourning the due date for those motions to November 22, 2017, with oppositions due December 4, 2017, and replies on December 18, 2017. Defendants do not object to an extension of those deadlines.

If these requests meet with Your Honor's approval, we respectfully request that Your Honor "So Order" this letter. Alternatively, we respectfully request a status conference with Your Honor to discuss

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these issues as soon as practicable. Counsel for the parties are available tomorrow July 27, the afternoon of July 28, or July 31.

Respectfully submitted,

*/s/ Melissa Steedle Bogad*

Melissa Steedle Bogad

cc: All Counsel (by email)

IT IS ON THIS 27 DAY OF July, 2017,  
SO ORDERED.



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Hon. Cathy L. Waldor, U.S.M.J.